## **REMARKS**

Claims 1, 16, and 17 are amended to better define the present invention. Claim 18 is amended to depend from method Claim 17 instead of system Claim 16 as originally presented. Claim 22 is cancelled without prejudice, as the substance of that claim now is in amended Claim 17. Claims 25-27 are cancelled without prejudice.

Claims 1-21, 23, and 24 remain, with no claim previously allowed.

Claims 1-6, 17, 20, 21, 23, and 24 stand rejected as anticipated by *Razin* (US 6,125,377). This rejection is traversed, as possibly applied to amended Claim 1 and the claims depending thereon.

Independent Claims 1 and 17 are amended to add the limitations that a "formatting run" is the smallest section of text within the document having the same formatting attributes. This definition of formatting run appears in the present specification, for example, at page 2, line 12; page 6, line 4; and page 11, lines 20-22.

Claim 1 defines a system including a formatting constancy checker for storing formatting runs as defined in that amended claim, in association with the location of the formatting run within the document, and a format checker that retrieves run location data from the format constancy checker to determine a minority formatting instance, and to report a formatting inconstancy to a user. The present invention also displays formatting runs readily accessible in a formatting pane, a client component introduced in Claim 7.

Razin does not identify or store a formatting run comprising the smallest section of text within a document. Instead, that reference teaches identifying styles only when present in a number of occurrences that exceeds a predetermined minimum number or

proportion of occurrences. Please see column 2, lines 8-10 and 34-37; column 3, lines 37-39; and column 13, lines 21-25 and 34-35. Accordingly, *Razin* would not identify or store, as a formatting run, those instances of formatting failing to exceed a predetermined minimum number or proportion, and this reference thus fails to anticipate Claims 1 et al wherein the formatting run is the smallest section of text having the same formatting attributes within a document.

Claim 7-12 and 19 stand rejected as unpatentable over *Razin* in view of *Newbold* et al (US 5,576,955). The rejection cites *Newbold* as disclosing a formatting pane operative to display a log of all formatting within a document, and otherwise to meet the limitation of rejected claims not specifically disclosed by *Razin*. (In this rejection, the paragraph bridging pages 6 and 7 mentions "the purposes disclosed by Fein...". The undersigned believes the mention of "Fein" in this rejection was intended to identify -- *Newbold*--.) The Applicants respectfully traverse this rejection, as thus understood.

As pointed out above, *Razin* fails to disclose a system including a formatting constancy checker for storing a formatting run as the smallest section of text within the document having the same formatting attributes. Instead, *Razin* teaches *away from* that requirement of the claimed invention, as that reference directs one of ordinary skill to identify styles where particular attributes occur <u>more than a predetermined number or portion</u> of occurrences. This teaching of *Razin* is directly contrary to the present invention. Nothing in either applied reference would have caused one of ordinary skill to ignore that teaching and, instead, discover and adopt the solution disclosed and claimed by the present Applicants. Accordingly, Claims 7-12 and 19 are patentable over *Razin* in view of *Newbold*.

Claims 13-15 and 25-27 stand rejected as unpatentable over *Razin* in view of *Fein* et al (US 6,088,711). Fein is cited as disclosing a system including the step of determining whether all major formatting properties match all the major formatting properties of the existing style. This rejection is respectfully traversed, as possibly applied to amended Claims 13-15 (Claims 25-27 no longer remain in the application). As previously pointed out *Razin* does not disclose a system wherein the formatting run is the smallest section of text having the same formatting attributes and, indeed, teaches away from that limitation recited in the rejected claims. Accordingly, those claims define non-

Claims 16, 18 and 22 stand rejected as of patentable over *Razin* in view of *Newbold* and *Fein*. This rejection is traversed for the reasons set forth above with respect to *Razin*.

obvious subject matter over Razin in view of Fein.

The foregoing is submitted as a complete response to the Office Action identified above. The Applicant submits that all claims in this application are in condition for allowance and solicits a notice to that effect.

Respectfully submitted,

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